

# **EXHIBIT 27**

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK  
4 Civil Action No. 7:17-cv-08943

5 -----x  
6 NATIONAL ASSOCIATION FOR THE ADVANCEMENT  
7 OF COLORED PEOPLE, SPRING VALLEY BRANCH,  
8 et al.,

9 Plaintiffs,

10 - against -

11 EAST RAMAPO CENTRAL SCHOOL DISTRICT,  
12 et al.,

13 Defendants.

14 -----x

15 March 8, 2018  
16 2:05 p.m.

17 Deposition of NATIONAL ASSOCIATION  
18 FOR THE ADVANCEMENT OF COLORED PEOPLE,  
19 SPRING VALLEY BRANCH, by WILLIE J. TROTMAN,  
20 taken by Defendants, pursuant to Rule  
21 30(b)(6) Notice, held at the offices of  
22 Morgan Lewis & Bockius LLP, 101 Park  
23 Avenue, New York, New York, before Todd  
24 DeSimone, a Registered Professional  
25 Reporter and Notary Public of the State of  
New York.

1 TROTMAN

2 W I L L I E J. T R O T M A N,  
3 called as a witness, having been first duly  
4 sworn, was examined and testified  
5 as follows:

6 EXAMINATION BY MR. BUTLER:

7 Q. Good afternoon, Mr. Trotman.  
8 How are you today?

9 A. Good afternoon.

10 Q. Are you doing okay?

11 A. I'm doing okay.

12 Q. We are now going to start the  
13 deposition of the NAACP, and you are the  
14 representative for the NAACP; is that  
15 correct?

16 A. Correct.

17 Q. Just as a preliminary matter,  
18 the same rules of engagement that we  
19 discussed this morning with respect to your  
20 individual deposition is what we are going  
21 to try to observe with respect to this  
22 deposition. All right?

23 A. Okay.

24 Q. Let's begin with you telling  
25 us, please, what you did to prepare for

1 TROTMAN

2 Q. Are you sure?

3 A. I'm not positive.

4 Q. Anything other than 10 and part  
5 of 15?

6 A. That's the only ones I can  
7 think of presently. That's it.

8 Q. What is the NAACP of Spring  
9 Valley?

10 A. The NAACP of Spring Valley is a  
11 chapter of the National Association for the  
12 Advancement of Colored People whose mission  
13 is to eliminate injustice and inequality  
14 and discrimination.

15 Q. So its goals are to eliminate  
16 injustice and inequality and  
17 discrimination?

18 A. Correct.

19 Q. Are there any other goals?

20 A. That's the generalization of  
21 it.

22 Q. When was the Spring Valley  
23 Branch of the NAACP started?

24 A. 1951.

25 Q. Who started it?

1 TROTMAN

2 A. A young lady -- what's her  
3 name -- Atkins. I can't think of the first  
4 name offhand.

5 Q. And you have been the president  
6 since 2004, correct?

7 A. That is correct.

8 Q. Who is your vice president?

9 A. First vice president is Ouida  
10 Toutedbon.

11 Q. Could you spell that?

12 A. O-u-i-d-a T-o-u-t-e-b-o-n.

13 Q. Is that a Ms. or a Mr.?

14 A. Mr. -- I mean Ms., I'm sorry,  
15 Ms.

16 Q. Thank you. I'm not quite as  
17 embarrassed.

18 How long has Ms. Toutedbon  
19 been --

20 A. I'm going to say first vice  
21 president, two years.

22 Q. Who are the other officers?

23 A. Second vice president is Vivian  
24 Street.

25 Q. How long has Ms. Street been

1 TROTMAN

2 Committee?

3 A. Correct.

4 Q. Are all of the people on the  
5 Executive Committee of the NAACP of Spring  
6 Valley residents of the area?

7 A. You have to be a bit more  
8 precise when you say "area."

9 Q. Well, what are the geographic  
10 confines of the NAACP of Spring Valley?  
11 What's your catchment area?

12 A. That's pretty much a  
13 two-pronged answer. The membership can be  
14 national. There are no limitations on  
15 where you have to be to be a member. So we  
16 have members in North Carolina and Florida.

17 Q. Who are members of the NAACP of  
18 Spring Valley?

19 A. Correct.

20 Q. I will get to that. But we can  
21 jump right into that.

22 How many members do you have in  
23 NAACP of Spring Valley?

24 A. Approximately 400.

25 Q. 400 total members?

1 TROTMAN

2 Q. So if I want to be a member, I  
3 have to pay dues?

4 A. Yes.

5 Q. I can't be a member if I don't  
6 pay dues?

7 A. That's true.

8 Q. How much are the dues?

9 A. For a regular member, \$30 a  
10 year.

11 Q. What about a not regular  
12 member?

13 A. So it's \$30 for a member, \$75 a  
14 year for ten years, \$150 for ten years, and  
15 \$250 for ten years.

16 Q. Those are the different  
17 categories of membership?

18 A. Correct.

19 Q. How many regular members does  
20 NAACP of Spring Valley currently have, of  
21 the somewhere around 400 members?

22 A. About 50 percent are life  
23 subscribing members.

24 Q. So roughly 200 are regular  
25 members and 200 are in one of those

1 TROTMAN

2 of the time is spent on educational issues  
3 in general.

4 Q. Is it fair to say that the  
5 majority of the activity of NAACP of Spring  
6 Valley focuses on education and issues  
7 relating to the school board and the school  
8 district?

9 A. Education, yes.

10 Q. Is it fair to say that the  
11 NAACP opposes the policies and practices of  
12 the current school board?

13 MR. TURNER: I object to form.

14 A. I can't really say policies,  
15 but quite a few of the practices.

16 Q. Is it fair to say that the  
17 NAACP disapproves of several of the current  
18 school board members?

19 A. Not necessarily the members per  
20 se, but many of their policies and their  
21 practices.

22 Q. So your testimony is that the  
23 NAACP doesn't oppose Hasidic members on the  
24 board?

25 A. No, we don't.



1 TROTMAN

2 Q. But NAACP disagrees with and  
3 disapproves of certain of the policies of  
4 the board; is that correct?

5 A. That is correct.

6 Q. You have already discussed in  
7 your earlier deposition an issue having to  
8 do with polling places, so I would like you  
9 to put that aside.

10 A. Okay.

11 Q. Other than that polling places  
12 concern, what policy and practice of the  
13 board does NAACP oppose?

14 A. Besides the polling places, the  
15 location of the polling places, location  
16 meaning there are some of them in schools  
17 while kids are in school, that's what I  
18 mean; the no trespassing, allowing  
19 trespassing by anyone while the students  
20 are in school; the executive sessions when  
21 the monitors are not present; not seemingly  
22 making education a top priority; not  
23 seemingly making education resources a top  
24 priority; not making the physical  
25 buildings, the repair of the physical

1 TROTMAN

2 Q. The white bloc vote, is that  
3 the Hasidic/Orthodox Jewish vote?

4 A. I cannot say it is the white  
5 Jewish vote. I can say it is probably  
6 white and maybe Jewish. I can't  
7 specifically say they are Jewish. It is  
8 the white bloc vote though.

9 Q. So you think that the white  
10 Jewish Hasidic voters joined together with  
11 other white voters and defeat minority  
12 candidates?

13 A. Candidates, not minority,  
14 candidates who believe in public and/or  
15 equal education for all.

16 Q. So the differences that  
17 separate the two blocs of voting are policy  
18 issues about what you are going to support  
19 in your school district, right?

20 MR. TURNER: Objection to form.

21 A. I would say pretty much, yes.

22 Q. So when you have the public  
23 school candidates, those are the ones who  
24 support spending money on public schools in  
25 a particular way, and when you have the

1 TROTMAN

2 you will?

3 A. Right.

4 Q. Now explain to me what the  
5 NAACP understands to be the private school  
6 candidates' view and the private school  
7 slate, how do they differ?

8 A. We think that the private  
9 schools, the private school candidates  
10 believe in less taxation, pretty much in  
11 segregation, of gender segregation, race  
12 segregation.

13 Q. Is that it?

14 A. That's it.

15 Q. And when you talk about gender  
16 segregation and race segregation, you are  
17 saying in the Yeshivas where the private  
18 school community sends their children,  
19 there are not a whole lot of minorities and  
20 the sexes are generally segregated by  
21 school, correct?

22 A. I'm saying -- what I'm saying  
23 is there are three school buses that pass  
24 me by when I'm standing. There is a school  
25 bus with Latinos and blacks and a few

I N D E X

WITNESS	EXAMINATION BY	PAGE
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E X H I B I T S

NAACP	DESCRIPTION	PAGE
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DIRECTIONS NOT TO ANSWER

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(NONE)

REQUESTS

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(NONE)

CERTIFICATION

I, TODD DeSIMONE, a Notary Public for  
and within the State of New York, do hereby  
certify:

That the witness whose testimony as  
herein set forth, was duly sworn by me; and  
that the within transcript is a true record  
of the testimony given by said witness.

I further certify that I am not related  
to any of the parties to this action by  
blood or marriage, and that I am in no way  
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set  
my hand this 8th day of March, 2018.



TODD DESIMONE

\* \* \*